

FEDERAL ELECTION COMMISSION

999 E Street, N.W.

Washington, D.C. 20463

2004 MAY 21 A 9:54

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR 5347

DATE COMPLAINT FILED: 1/16/03

DATE OF NOTIFICATION: 1/24/03

DATE ACTIVATED: 2/18/04

EXPIRATION OF SOL: 10/09/07

COMPLAINANT:

Deirdre Barnes

RESPONDENTS:

Pennsylvania Democratic Party and

James Byrnes, as treasurer

U.S. Representative Joseph M. Hoeffel

Hoeffel for Congress Committee and

Jeffrey B. Albert, as treasurer

Democratic Congressional Campaign Committee

and James J. Bonham, as treasurer¹

RELEVANT STATUTES:

2 U.S.C. § 434(b)

2 U.S.C. § 441a(a)

2 U.S.C. § 441a(d)

2 U.S.C. § 441a(f)

11 C.F.R. § 110.7

INTERNAL REPORTS CHECKED:

Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

¹ The Democratic Congressional Campaign Committee formerly had two separately identified committees: the Democratic Congressional Campaign Committee-Contributions, and the Democratic Congressional Campaign Committee-Expenditures. Both of these committees were notified as respondents in this matter. However, on March 3, 2004, the Democratic Congressional Campaign Committee-Contributions was allowed to terminate, and on March 18, 2004, the Democratic Congressional Campaign Committee-Expenditures began filing reports without the "Expenditures" designation. The Democratic Congressional Campaign Committee and James J. Bonham, as treasurer, now answer on behalf of both committees and appear as respondents. Additionally, Howard Wolfson served as treasurer of both committees at the time the complaint was filed.

I. INTRODUCTION

The complaint in this matter alleges that the Pennsylvania Democratic Party ("PDP") made excessive contributions to the Hoeffel for Congress Committee ("Hoeffel Committee") during the 2002 election for Pennsylvania's 13th Congressional District.² Specifically, the complaint alleges that the PDP spent \$734,807 on coordinated expenditures for advertising while the limit under 2 U.S.C. § 441a(d) was \$35,910. Attachment 1 (Complaint) at 1-2.³ The complaint further alleges that the Democratic Congressional Campaign Committee ("DCCC") and Rep. Hoeffel "should be held accountable" because they may have been "aware of these violations [or] aided or devised the scheme" *Id.* at 2.

Because the complaint involves the issue of pre-BCRA party coordination, this Office initially considered treating it in the same manner as those matters summarily dismissed after the Commission's decision in MUR 5369 (Rhode Island Republican Party). In MUR 5369, the Commission found no reason to believe that the Rhode Island Republican Party ("RIRP") violated the Act by failing to disclose \$114,789 in expenditures for advertisements in support of Senator Lincoln Chafee. The Commission's no reason to believe finding in MUR 5369 was based, at least in part, on the perceived unfairness of proceeding against that committee when similar recommendations concerning pre-BCRA non-express advocacy party communications had not garnered four votes. The Commission directed OGC to recommend summary dismissal of the remaining matters on OGC's docket involving similar activity. Accordingly, this Office recommended summary dismissal of MUR 5058 (Gore 2000) and Audit Referrals 01-05

² The activity in this matter is governed by the Federal Election Campaign Act of 1971, as amended ("the Act"), and the regulations in effect during the pertinent time period, which precedes the amendments made by the Bipartisan Campaign Reform Act of 2002 ("BCRA"). All references to the Act and regulations in this Report exclude the changes made by BCRA.

³ The complaint and its attachments are included as an attachment to this report. This was done for convenience because we refer frequently to the attachments to the complaint, which were not originally paginated.

(Schumer) and 01-06 (Inglis). *See* Combined General Counsel's Report in MUR 5058 and Audit Referrals AR 01-05 and AR 01-06 (July 31, 2003). The Commission approved these recommendations on August 8, 2003. *See* Certification for MUR 5058 and Audit Referrals AR 01-05 and AR 01-06 (August 8, 2003).

While we ultimately recommend the Commission find no reason to believe that respondents in this matter violated the Act, we do not recommend summary dismissal as in MUR 5058, and Audit Referrals 01-05 and 01-06. In those matters, there was at least some evidence of prohibited coordination. In this matter, however, respondents have provided sufficient information in response to the complaint to justify findings of no reason to believe.

In their responses, both the PDP and the Hoeffel Committee acknowledge that they coordinated one advertisement on behalf of Rep. Hoeffel, but state that the amount spent in connection with this advertisement was well below the PDP's coordinated spending limit. PDP Response at 1; Hoeffel Committee Response at 1-2. While the complaint alleges that the PDP spent \$734,807 on advertisements coordinated with the Hoeffel Committee, the complaint's attachments show only one advertisement paid for by the PDP during the election cycle. This advertisement was indeed coordinated with the candidate and was reported to the Commission as such. The Hoeffel Committee and the PDP have provided additional evidence that any expenditures made in connection with this advertisement were below the PDP's coordinated spending limit.

For its part, the DCCC contends that it made no coordinated expenditures for advertising on behalf of Rep. Hoeffel in 2002, because the advertisement it ran did not contain express advocacy. DCCC Response at 1-2. Because none of the available information indicates that this

1 advertisement was coordinated with the Hoeffel Committee, there appears to be no reason to
2 believe the DCCC violated the Act.⁴

3 Because neither the PDP nor the DCCC appears to have made excessive coordinated
4 expenditures on behalf of the Hoeffel Committee, it does not appear that Rep. Hoeffel or the
5 Hoeffel Committee violated 2 U.S.C. § 441a(f) by receiving excessive in-kind contributions. As
6 such this Office recommends the Commission find no reason to believe that the PDP, DCCC,
7 Rep. Hoeffel, or the Hoeffel Committee violated the Act.

8 **II. FACTUAL AND LEGAL ANALYSIS**

9 While there is no limit to the amount of money a state party can spend on independent
10 expenditures, the Act limits the contributions that political party committees may make to or on
11 behalf of candidates for federal office.⁵ Contributions by political party committees to their
12 candidates are limited to \$5,000 per election. 2 U.S.C. § 441a(a)(2)(A). In addition to the limits
13 the Act places on direct contributions, the Act permits limited "coordinated" expenditures to be
14 made by party committees "in connection with general election campaign[s] of candidates for
15 Federal office," including expenditures for communications such as advertising. 2 U.S.C.
16 § 441a(d). In 2002, the coordinated party expenditure limit was \$35,910 per House candidate.⁶

17 **A. It Does Not Appear that the PDP Exceeded its 2002 Coordinated Spending** 18 **Limit.**

19
20 Neither the evidence attached to the complaint nor other publicly available information
21 substantiates complainant's allegations concerning the PDP. Rather, based on this Office's

⁴ If there was additional evidence of coordination, because the advertisement did not contain express advocacy, this Office would likely have recommended summary dismissal as in MUR 5058 and ARs 01-05 and 01-06.

⁵ An "independent expenditure" is an expenditure that is made by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such committee, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate. 2 U.S.C. § 431(17).

⁶ Federal Election Commission, *2002 Coordinated Party Expenditure Limits*, The Record, 13-14 (March 2002).

1 review, it appears that while the PDP did make an expenditure for advertising in coordination
2 with the Hoeffel Committee, this expenditure was below the PDP's coordinated expenditure
3 limit.

4 As stated above, the 2002 coordinated party expenditure limit was \$35,910 per House
5 candidate. However, during the 2002 election cycle, the DCCC assigned \$35,609.07 of its
6 coordinated spending authority to the PDP.⁷ See 11 C.F.R. § 110.7. This assignment meant that
7 the PDP was able to make up to \$74,107.21 in coordinated expenditures on behalf of Rep.
8 Hoeffel.⁸ Complainant alleges that the PDP spent \$734,807 on such expenditures—nearly ten
9 times the permissible amount. Attachment 1 at 1. As evidence supporting this allegation,
10 complainant attaches a report by the Campaign Media Analysis Group ("CMAG"), detailing the
11 advertisements aired in connection with the race in question.⁹ *Id.* at 3-25.

12 The CMAG report indicates that during the period from October 9 to November 5, 2002,
13 a total of seven television advertisements aired in connection with the race in question. Of these
14 seven, five were in support of Rep. Hoeffel, while the remaining two were in support of his
15 opponent, Melissa Brown. The following chart details the Hoeffel advertisements, and is based
16 upon a review of the advertisements' storyboards and scripts:

⁷ A party committee may assign all or part of its coordinated spending authority. 2 U.S.C. § 441a(a)(4); 11 C.F.R. §§ 110.7(a)(4), (c); see also *FEC v. Democratic Senatorial Campaign Committee*, 484 U.S. 27 (1981). On October 24, 2002, the DCCC sent a letter to Bob Barnett, Executive Director of the PDP, assigning \$35,609.07 of the DCCC's coordinated spending authority to the PDP. See PDP Response at 2. The DCCC reported \$299 in coordinated expenditures on behalf of Hoeffel during 2002, accounting for the difference between the coordinated limit and the amount of coordinated spending authority the DCCC transferred to the PDP.

⁸ This amount includes the additional \$2,588.14 in contributions the PDP was permitted to make to the Hoeffel Committee after its \$1,000 direct contribution on November 1, 2002 and \$1,411.86 in-kind contribution on November 2, 2002. 2 U.S.C. § 441a(a)(2)(A).

⁹ CMAG is a private company providing "adtracking" services.
<http://www.cmagreports.com/cmagtrax/boutcmag.asp> (visited March 1, 2004).

HOEFFEL ADVERTISEMENTS

NAME	PAID FOR BY	REPORTED AS COORDINATED?
Brown Warning	Hoeffel Committee	N/A
Middle of the Street	Hoeffel Committee	N/A
Hoeffel Record	Hoeffel Committee	N/A
Newspapers	PDP and authorized by the Hoeffel Committee	Yes
Brown's Failed Healthcare Co.	DCCC	No

Complainant alleges that “[a]ll of these ads aired by the PDP contained the disclaimer legally required for coordinated expenditures: ‘Paid for by the Pennsylvania Democratic Party and Authorized by Hoeffel for Congress.’” Attachment 1 at 1. Yet, as the chart reflects, only one advertisement, “Newspapers,” contained such a disclaimer. This advertisement was paid for by the PDP and reported as a coordinated expenditure on Schedule F of its amended 2002 Post-General Report.¹⁰ Attachment 2 at 5; *see also* Attachment 1 at 9.

In reviewing the CMAG report, it appears that complainant’s \$734,807 figure is based on complainant’s mistaken belief that the PDP paid for both “Newspapers” and “Brown’s Failed Healthcare Co.” Complainant’s mistake is understandable as it appears to have been based on an error in the CMAG report. On the page titled “Air Date Summary,” both “Newspapers” and “Brown’s Failed Healthcare Co.” are labeled as “PADP” advertisements, apparently referring to the Pennsylvania Democratic Party. Attachment 1 at 11. The rightmost column on that page provides estimates of the costs of the advertisements. *Id.* CMAG’s combined estimated cost for “Newspapers” and “Brown’s Failed Healthcare Co.” is exactly \$734,807. However, “Brown’s Failed Healthcare Co.” does not appear to have been paid for by the PDP. Rather, the disclaimer

¹⁰ This Office notes that the \$60,000 coordinated expenditure was reported in an amended report filed after the PDP was notified of the complaint. PDP claims that its error in reporting the coordinated expenditure was due to an error with the Gnosso electronic filing software. PDP Response at 1. Failure to report this expenditure in the original 2002 Post-General Report would constitute a violation of 2 U.S.C. §§ 434(b)(4)(H)(iv) and (6)(B)(iv). However, in light of PDP’s effort in amending its report to reflect the expenditure in question, this Office makes no recommendation on this issue.

1 for that advertisement reads, "Paid for by the Democratic Congressional Campaign Committee."
2 Attachment 1 at 10.

3 After subtracting CMAG's estimated cost for "Brown's Failed Healthcare Co." from the
4 total amount alleged in the complaint, the remaining amount for "Newspapers" is \$266,722, still
5 well above PDP's coordinated expenditure limit. However, this is only an estimated amount,
6 and the complaint gives the Commission no indication of how CMAG reached this figure. While
7 the CMAG report includes a "Program Summary" chart showing the estimated airtime costs for
8 each time a spot aired and the particular program during which it aired, that chart is not
9 informative because it does not include the spots' titles and, like the "Airdate Summary,"
10 conflates the DCCC and the PDP. Attachment 1 at 14-20. In contrast, the PDP is specific in its
11 denial of the allegations and supports its contentions with additional evidence.

12 The PDP contends that the only funds it spent "on behalf of the Hoeffel for Congress
13 Campaign amounted to \$60,000 [which] was paid entirely to the Campaign Group, Inc. for the
14 production and airing of one television commercial." PDP Response at 1. In support of this
15 contention, the PDP attached a letter from Neil Oxman, a representative of The Campaign
16 Group, Inc., the media vendor that produced and purchased airtime for "Newspapers." This
17 letter stated that the \$60,000 expenditure "was the only money [The Campaign Group] received
18 from the Pennsylvania Democratic Party for the Hoeffel campaign." PDP Response at
19 Attachment 2; Hoeffel Committee Response at Attachment 1.¹¹ The PDP also attached a wire
20 transfer receipt for the \$60,000 payment from the PDP to The Campaign Group, as well as a
21 letter from Carolyn Tyson, an account executive at WYW-TV in Philadelphia, PA, the television

¹¹ Reports filed with the Commission show no other disbursements from the PDP to The Campaign Group.

1 station that ran "Newspapers."¹² PDP Response at Attachments 3 and 4; Hoeffel Committee
2 Response at Attachments 2 and 3. Tyson's letter confirms that the station aired the spot, and that
3 it contained the disclaimer: "Paid for by [the] Pennsylvania Democratic Party Authorized by
4 Hoeffel for Congress." *Id.* The Tyson letter also indicates that the cost of the airtime for this
5 advertisement was \$55,641.00. *Id.* This amount is consistent with Oxman's letter stating that
6 the remaining \$4,359 was for production costs. *Id.* Oxman states that WYW-TV was "the only
7 television station which received this commercial with this disclaimer," and that the other
8 advertisements ran with a "Paid for by Hoeffel for Congress" disclaimer. *Id.*¹³

9 Although there is a disparity between the estimated cost for "Newspapers" on the CMAG
10 report and the amount stated in the PDP's and Hoeffel Committee's responses, we believe that
11 on balance the information submitted by the respondents is sufficiently detailed to overcome the
12 allegations in the complaint. Although it seems unusual that "Newspapers" would air only on
13 one station in one market, the CMAG "Program Summary" fails to shed any light on the subject
14 because it conflates the PDP and the DCCC. "A complaint may be dismissed if it consists of
15 factual allegations that are refuted by sufficiently compelling evidence produced in responses to
16 the complaint." Statement of Reasons in MUR 4960 (Hillary Rodham Clinton for U.S. Senate
17 Exploratory Committee, issued December 21, 2000); *see also Orloski v. FEC*, 795 F.2d 156, 168
18 (D.C. Cir. 1986) (at the reason to believe stage in a complaint proceeding, the Commission must
19 "make a subjective evaluation of the claims"). Here, the PDP produced considerable evidence in

¹² Tyson's letter refers to the advertisement the CMAG report calls "Newspapers" as "Wrong #5." PDP Response at Attachment 4; Hoeffel Committee Response at Attachment 3. "Newspapers" and "Wrong #5" appear to be the same advertisement insofar as the Tyson letter indicates that "Wrong #5" contained the disclaimer Paid for by [the] Pennsylvania Democratic Party Authorized by Hoeffel for Congress." Moreover, the first line of "Newspapers" as shown in the CMAG report is, "Melissa Brown is Wrong." Attachment 1 at 9.

¹³ These "other advertisements" apparently refer to "Brown Warning," "Middle of the Street" and "Hoeffel Record." Reports filed with the Commission indicate that the Hoeffel Committee also used The Campaign Group to produce its advertisements. The Hoeffel Committee's 2002 Amended Year-End report shows \$285,000 in payments to The Campaign Group.

1 support of its contention that its admittedly coordinated expenditures were well below the Act's
2 limits. We do not believe that a further investigation at this time would be an efficient use of
3 Commission resources. Accordingly, this Office recommends the Commission find no reason to
4 believe the PDP violated the Act by exceeding its coordinated spending limit under 2 U.S.C.
5 § 441a(d).

6 **B. The Allegations Regarding the DCCC Also Warrant Dismissal.**

7 Though the allegations in the complaint are primarily focused on the PDP, the complaint
8 also states that, "[t]o the extent that Rep. Joe Hoeffel and the Democratic Congressional
9 Campaign Committee were aware of [the PDP's] violations, and aided or devised the scheme,
10 they should be held accountable as well." Attachment 1 at 2.

11 As discussed above, during the 2002 election cycle the DCCC transferred its coordinated
12 spending authority to the PDP, leaving it unable to make any additional coordinated expenditures
13 on behalf of Rep. Hoeffel. DCCC Response at 1. The DCCC did air its own advertisement in
14 connection with the race in question. Thus, if this advertisement was coordinated with the
15 Hoeffel Committee, any amount spent in producing or airing it might constitute an excessive in-
16 kind contribution. 2 U.S.C. § 441a(a)(7)(B)(i).

17 The DCCC argues in its response that its advertisement "is not a coordinated party
18 expenditure" because it "does not expressly advocate the election or defeat of any candidate."
19 DCCC Response at 2. The storyboard and script for the DCCC's advertisement, "Brown's
20 Failed Healthcare Co.," were attached to the complaint. Attachment 1 at 10. The advertisement
21 does not appear to contain express advocacy, exhorting viewers only to "Call Melissa Brown and
22 tell her to fight for us, not the insurance executives." *Id.* More importantly, there is no evidence
23 suggesting that the DCCC and the Hoeffel Committee coordinated the production of "Brown's

Failed Healthcare Co.” Accordingly, we recommend the Commission find no reason to believe the DCCC violated the Act.

C. No Evidence Suggests that Rep. Hoeffel or the Hoeffel Committee Violated the Act.

The Act prohibits candidates and their committees from knowingly accepting coordinated expenditures in excess of the combined § 441a(a)(2)(a) and § 441a(d) limitations. 2 U.S.C. § 441a(f). However, to the extent that neither the PDP nor the DCCC appears to have violated the Act by making excessive coordinated expenditures to the Hoeffel Committee, there is no reason to believe that Rep. Hoeffel or the Hoeffel Committee violated the Act by receiving excessive in-kind contributions. As such, we recommend the Commission find no reason to believe that Rep. Hoeffel or the Hoeffel Committee violated the Act in connection with this matter.

III. RECOMMENDATIONS

1. Find no reason to believe the Pennsylvania Democratic Party and James Byrnes, as treasurer, violated 2 U.S.C. §§ 441a(a)(2)(A), 441a(d)(3), and 441a(f).
2. Find no reason to believe the Democratic Congressional Campaign Committee and James J. Bonham, as treasurer, violated 2 U.S.C. §§ 441a(a)(2)(A), 441a(d)(3), and 441a(f).
3. Find no reason to believe U.S. Representative Joseph M. Hoeffel violated 2 U.S.C. § 441a(f).
4. Find no reason to believe the Hoeffel for Congress Committee and Jeffrey B. Albert, as treasurer, violated 2 U.S.C. § 441a(f).
5. Approve the appropriate letters.
6. Close the file.

Lawrence H. Norton
General Counsel

Rhonda J. Vosdingh
Associate General Counsel
for Enforcement

Date 5/20/09

BY: Lawrence Calvert
Lawrence Calvert
Deputy Associate General Counsel
for Enforcement

Jesse B. Christensen
Jesse B. Christensen
Attorney

Attachments:

1. Complaint and Attachments.
2. Relevant portions of the PDP's amended 2002 Post-General Report.

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Revised 1/2001)

Page 2

Write or Type Committee Name
Pennsylvania Democratic Party

Report Covering the Period: From: ^{MM}10 ^{DD}17 ^{YY}2002 To: ^{MM}11 ^{DD}25 ^{YY}2002

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1 ^{YY} 2002		23174.22
(b) Cash on Hand at Beginning of Reporting Period	166785.77	
(c) Total Receipts (from Line 19)	1999847.43	4140304.98
(d) Subtotal (add lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	2166633.20	4163479.20
7. Total Disbursements (from Line 30)	2058573.06	4055419.06
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	109060.14	108060.14
9. Debts and Obligations owed TO the committee (Itemize all on Schedule C and/or Schedule D)00	
10. Debts and Obligations owed BY the committee (Itemize all on Schedule C and/or Schedule D)00	

☒ This Committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information contact:

Federal Election Commission
999 E street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-684-1100

ATTACHMENT 2
Page 2 of 5

**DETAILED SUMMARY PAGE
OF RECEIPTS**

FEC Form 3X (Revised 1/2001)

Page 3

Write or Type Committee Name

Pennsylvania Democratic Party

Report Covering the Period: From: ^M10 ^D17 ^Y2002 To: ^M11 ^D25 ^Y2002

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees	100000.00	
(i) Itemized (use Schedule A)	35950.02	
(ii) Unitemized		
(iii) TOTAL (add Lines 11(a)(i) and (ii)	135950.02	345211.52
(b) Political Party Committees	320453.63	625240.15
(c) Other Political Committees (such as PACs)	50700.00	98700.00
(d) Total Contributions (add Lines 11(a)(iii), (b) and (c) (Carry Totals to Line 32, page 4)	507103.65	1069151.67
12. Transfers From Affiliated/Other Party Committees	12398.21	55192.10
13. All Loans Received	0.00	0.00
14. Loan Repayments Received	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 36, page 4)	0.00	45556.26
16. Refunds of Contributions Made to Federal candidates and Other Political Committees	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.)	0.00	0.00
18. Transfers from Nonfederal Account for Joint Activity	1480345.57	2970404.65
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18)	1999847.43	4140304.98
20. Total Federal Receipts (subtract Line 18 from Line 19)	519501.86	1169900.33

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Revised 1/2001)

Page 4

II. DISBURSEMENTS	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Shared Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share.....	319787.34	1036931.07
(ii) Non-Federal Share.....	1598552.85	2750793.91
(b) Other Federal Operating Expenditures.....	59604.40	126325.61
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii) and (b))..... ▶	1977944.59	3914050.59
22. Transfers to Affiliated/Other Party Committees.....	0.00	3850.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	11800.00	11800.00
24. Independent Expenditure (use Schedule E).....	0.00	0.00
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F).....	66740.47	79240.47
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees.....	0.00	40.00
(b) Political Party Committees.....	0.00	0.00
(c) Other Political Committees (such as PACs).....	2088.00	46438.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c))..... ▶	2088.00	46478.00
29. Other Disbursements.....	0.00	0.00
30. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), and 29)..... ▶	2058573.06	4055419.06
31. Total Federal Disbursements (subtract Line 21(a)(ii) from Line 30)..... ▶	460020.21	1304625.15
<hr/>		
III. Net Contributions/Operating Expenditures		
32. Total Contributions (other than loans) from Line 11(d), page 3).....	507103.65	1069151.67
33. Total Contribution Refunds (from Line 28(d)).....	2088.00	46478.00
34. Net Contributions (other than loans) (subtract Line 33 from Line 32).....	505015.65	1022673.67
35. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))..... ▶	379391.74	1163256.68
36. Offsets to Operating Expenditures (from Line 15, page 3).....	0.00	45556.26
37. Net Operating Expenditures (subtract Line 35 from Line 35)..... ▶	379391.74	1117700.42

ATTACHMENT 2
Page 4 of 5

SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(2 U.S.C. §441a(d))

(To be used only by Political Committees in the General Election)

PAGE 42 / 128

FOR LINE 25 OF FORM 3X

NAME OF COMMITTEE (In Full) Pennsylvania Democratic Party			
Has your committee been designated to make coordinated expenditures by a political party committee? YES X NO		Full Name of Subordinate Committee	
If YES, name the designating committee:		Mailing Address	
		City	State ZIP Code
Full Name (Last, First, Middle Initial) of Each Payee The Campaign Group		Purpose of Expenditure Generic Media Advertisement	
Mailing Address 1800 Locust Street		Category/ Type	
City	State	ZIP Code	Date
Philadelphia	PA	19103	10 / 25 / 2002
Name of Federal Candidate Supported	Office Sought: <input checked="" type="checkbox"/> House	State: PA	
Joseph M. Hoefel	Senate	District: 13	
		Presidential	
Aggregate General Election Expenditure for this Candidate ➤		60000.00	60000.00
Transaction ID: D2644			
Full Name (Last, First, Middle Initial) of Each Payee Stanford Research		Purpose of Expenditure Research Service Fee	
Mailing Address 2520 Longview Street		Category/ Type	
City	State	ZIP Code	Date
Austin	TX	78705	10 / 31 / 2002
Name of Federal Candidate Supported	Office Sought: <input checked="" type="checkbox"/> House	State: PA	
Paul E. Kanjorski	Senate	District: 11	
		Presidential	
Aggregate General Election Expenditure for this Candidate ➤		6740.47	6740.47
Transaction ID: D2703			
SUBTOTAL of Expenditures This Page (optional)			66740.47
TOTAL This Period (last page this line number only)			66740.47

FEC Schedule F (Form 3X) (Revised 1/2001)

ATTACHMENT 2
Page 5 of 5